

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

THE HOSPITAL AUTHORITY OF
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY,
TENNESSEE, d/b/a NASHVILLE GENERAL
HOSPITAL and AMERICAN FEDERATION OF
STATE, COUNTY AND MUNICIPAL
EMPLOYEES DISTRICT COUNCIL 37 HEALTH
& SECURITY PLAN,

Plaintiffs,

v.

MOMENTA PHARMACEUTICALS, INC. and
SANDOZ INC.,

Defendants.

Civil Action No. 3:15-cv-01100

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Barbara D. Holmes

**PLAINTIFFS' UNOPPOSED MOTION TO DIRECT NOTICE
TO THE CLASS REGARDING SETTLEMENT**

Plaintiffs The Hospital Authority of Metropolitan Government of Nashville and Davidson County and American Federation of State, County and Municipal Employees District Council 37 Health and Security Plan, by and through their undersigned counsel, hereby move this Court pursuant to Federal Rule of Civil Procedure 23 for an order:

- (1) finding that the Court will likely approve the proposed class action settlements with Momenta Pharmaceuticals, Inc. and Sandoz Inc. under Rule 23(e)(2);
- (2) directing notice of the Settlements to the previously certified Class, and approving the proposed forms and manner thereof;
- (3) appointing A.B. Data Ltd. as the Notice and Claims Administrator;
- (4) setting a schedule for disseminating notice to Class members, and deadlines to object to the Settlements; and
- (5) scheduling a hearing pursuant to Rule 23(e) to determine whether the Settlements are fair, reasonable and adequate under Rule 23(e)(2) and should be approved.

This motion is based on this Motion and supporting Memorandum of Points and Authorities in Support; the Declaration of Brendan P. Glackin, filed herewith; the declaration of Russell L. Lamb, filed herewith; the declaration of Linda V. Young, filed herewith; the pleadings and papers filed in this action; and such other matters as the Court may consider.

Dated: December 20, 2019

Respectfully submitted,

/s/ Brendan P. Glackin

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of December, 2019, the foregoing document was filed electronically with the U.S. District Court for the Middle District of Tennessee. Notice of this filing was served via the court's electronic filing system on counsel listed below:

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